



14434 SE Industrial Way, Bldg C, Clackamas, Oregon 97015 • Phone 503.785.0404, Fax 503.786.7877

February 28, 2007

**SEPC**

Sadie Whitener  
Department of Ecology  
300 Desmond Dr  
Lacey, Washington 98503  
360-407-6729

**King County Office of  
Emergency Management**

Shad Burcham  
3511 NE 2nd  
Renton, WA 98056  
206.296-3830

**Seattle Fire Department**

301 2nd Avenue South  
Seattle, WA 98104  
206-386-1400

**RE: Alaskan Copper Works Tier II Report for 2007**

Clean Harbors Environmental Services, Inc. (CHES) as been retained by Alaskan Copper Works, Inc. located at 3200 6<sup>th</sup> Avenue S in Seattle, Washington 98134 to provide SARA Title III reporting services.

Under §312, this report reflects updated average and maximum hazardous chemical inventories located at the above address for the calendar year 2005 and likely inventory quantities for 2007.

All questions or inquiries in addition to future Tier II reporting notifications for Alaskan Copper Works, Inc. should be addressed to Jason Sullivan at 206-429-9100 or write to:

Jason Sullivan  
Project Manager  
Clean Harbors Environmental Services  
19320 Des Moines Memorial Drive, Suite 400  
SeaTac, WA 98148

Sincerely,



Jason Sullivan  
On Behalf of Alaskan Copper Works, Inc.

Community Right-to-Know  
(REQUIRED INFORMATION)

ID #: WAD980738546

(12-digit number beginning with CRK or WA)

<b>Facility Identification</b> UBI/DOR#: _____		<b>Main Contact</b> Name: MATTHEW DUNN Email: dunn.matthew@cleanh	
Name ALASKAN COPPER WORKS		Title: PDM Phone: (b) (6) Fax: (503) 786-7877	
Address 3200 6TH AVE SOUTH		<b>Mailing Address</b> <i>Must be included if different from Facility Address</i>	
City SEATTLE County KING State WA Zip 98134-		Address 3200 6TH AVE SOUTH	
Latitude 47_34_31 Longitude 122_19_33		City SEATTLE State WA Zip 98134-	
SIC Code _____ Dun & Bradstreet No. 00-925-5571 LEPC CITY OF SEATTLE		<b>Emergency Contact</b>	
<b>Owner/</b> Name ALASKAN COPPER WORKS		Name: GERALD THOMPSON Title: ENVIRONMENTAL SUPERVI	
<b>Operator</b> Street 3200 6TH AVE SOUTH		Phone: (206) 382-8379 24-hr. Phone: (206) 623-5800	
City SEATTLE State WA Zip 98134- Phone (206) 623-5800			
<b>Important: Read all instructions before completing form.</b>		<b>Reporting Period: From January 1 to December 31, 2007</b>	

Chemical Description	Physical and Health Hazards (check all that apply)	INVENTORY	Storage Codes			Storage Locations (Non-Confidential)
			Container Type	Pressure	Temperature	
CAS 000074-86-2 Trade Secret <input type="checkbox"/> Chem. Name: ACETYLENE EHS Name: _____  Check all that apply <input checked="" type="checkbox"/> Pure <input type="checkbox"/> Mix <input type="checkbox"/> Solid <input type="checkbox"/> Liquid <input checked="" type="checkbox"/> Gas <input type="checkbox"/> EHS	<input checked="" type="checkbox"/> FIRE <input checked="" type="checkbox"/> SUDDEN RELEASE of PRESSURE <input type="checkbox"/> REACTIVITY <input checked="" type="checkbox"/> IMMEDIATE (acute) <input checked="" type="checkbox"/> DELAYED (chronic)	12000 Max. Amount (lbs) 10000 Avg. Amount (lbs) 4 Max. Daily Amount (code) 4 Avg. Daily Amount (code) 365 No. of Days On-site (days)	L 2 4 L 2 4 L 2 4 L 2 4		3200 PRODUCTION GAS PAD 3317 PRODUCTION GAS PAD 3405 PRODUCTION AREA 3405 OUTSIDE GAS PAD	
CAS 007440-37-1 Trade Secret <input type="checkbox"/> Chem. Name: ARGON EHS Name: _____  Check all that apply <input checked="" type="checkbox"/> Pure <input type="checkbox"/> Mix <input type="checkbox"/> Solid <input type="checkbox"/> Liquid <input checked="" type="checkbox"/> Gas <input type="checkbox"/> EHS	<input type="checkbox"/> FIRE <input checked="" type="checkbox"/> SUDDEN RELEASE of PRESSURE <input type="checkbox"/> REACTIVITY <input type="checkbox"/> IMMEDIATE (acute) <input type="checkbox"/> DELAYED (chronic)	15000 Max. Amount (lbs) 11000 Avg. Amount (lbs) 4 Max. Daily Amount (code) 4 Avg. Daily Amount (code) 365 No. of Days On-site (days)	A 2 4 L 2 4 A 2 4 L 2 4		3200 PRODUCTION GAS PAD 3200 PRODUCTION GAS PAD 3405 OUTSIDE GAS PAD 3317 GAS PAD	

**Certification (Read and sign after completing all sections)**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages one thru \_\_\_\_\_ and that based on my inquiry of these individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Jason Sullivan (Agent) Alaskan Copper Works - Pm Clean Harbors

Name and official title of owner/operator's authorized representative

Signature

Date Signed

**OPTIONAL ATTACHMENTS**

- ☐ I have attached a site plan  
☐ I have attached a list of site coordinate abbreviations  
☐ I have attached a description of dikes and other safeguard measures

CAS 068476-34-6 Trade Secret <input type="checkbox"/> Chem. Name: DIESEL FUEL #2 EHS Name:  Check all that apply <input type="checkbox"/> Pure <input checked="" type="checkbox"/> Mix <input type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Gas <input type="checkbox"/> EHS	<input checked="" type="checkbox"/> FIRE <input type="checkbox"/> SUDDEN RELEASE of PRESSURE <input type="checkbox"/> REACTIVITY <input checked="" type="checkbox"/> IMMEDIATE (acute) <input checked="" type="checkbox"/> DELAYED (chronic)	11550 Max. Amount (lbs) 10000 Avg. Amount (lbs) 4 Max. Daily Amount (code) 4 Avg. Daily Amount (code) 365 No. of Days On-site (days)	A 1 4 3405 OUTSIDE WEST TANK FARM
CAS 007697-37-2 Trade Secret <input type="checkbox"/> Chem. Name: NITRIC ACID EHS Name: NITRIC ACID  Check all that apply <input type="checkbox"/> Pure <input checked="" type="checkbox"/> Mix <input type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Gas <input checked="" type="checkbox"/> EHS	<input type="checkbox"/> FIRE <input type="checkbox"/> SUDDEN RELEASE of PRESSURE <input checked="" type="checkbox"/> REACTIVITY <input checked="" type="checkbox"/> IMMEDIATE (acute) <input checked="" type="checkbox"/> DELAYED (chronic)	5000 Max. Amount (lbs) 5000 Avg. Amount (lbs) 3 Max. Daily Amount (code) 3 Avg. Daily Amount (code) 365 No. of Days On-site (days)	C 1 5 ETCHING AREA
CAS 007752-44-7 Trade Secret <input type="checkbox"/> Chem. Name: OXYGEN EHS Name:  Check all that apply <input checked="" type="checkbox"/> Pure <input type="checkbox"/> Mix <input type="checkbox"/> Solid <input type="checkbox"/> Liquid <input checked="" type="checkbox"/> Gas <input type="checkbox"/> EHS	<input checked="" type="checkbox"/> FIRE <input checked="" type="checkbox"/> SUDDEN RELEASE of PRESSURE <input checked="" type="checkbox"/> REACTIVITY <input checked="" type="checkbox"/> IMMEDIATE (acute) <input checked="" type="checkbox"/> DELAYED (chronic)	12600 Max. Amount (lbs) 11000 Avg. Amount (lbs) 4 Max. Daily Amount (code) 4 Avg. Daily Amount (code) 365 No. of Days On-site (days)	A 2 4 3200 PRODUCTION GAS PAD L 2 4 3200 PRODUCTION GAS PAD L 2 4 3317 PLASMA GAS PAD L 2 4 3405 PRODUCTION AREA L 2 4 3405 GAS PAD
CAS 000074-98-6 Trade Secret <input type="checkbox"/> Chem. Name: PROPANE EHS Name:  Check all that apply <input checked="" type="checkbox"/> Pure <input type="checkbox"/> Mix <input type="checkbox"/> Solid <input type="checkbox"/> Liquid <input checked="" type="checkbox"/> Gas <input type="checkbox"/> EHS	<input checked="" type="checkbox"/> FIRE <input checked="" type="checkbox"/> SUDDEN RELEASE of PRESSURE <input type="checkbox"/> REACTIVITY <input checked="" type="checkbox"/> IMMEDIATE (acute) <input checked="" type="checkbox"/> DELAYED (chronic)	12000 Max. Amount (lbs) 10000 Avg. Amount (lbs) 4 Max. Daily Amount (code) 4 Avg. Daily Amount (code) 365 No. of Days On-site (days)	A 2 4 3200 PRODUCTION NE OUTSIDE A 2 4 3405 PRODUCTION AREA



Clean Harbors Environmental Services  
12402 SE Jennifer Street, Suite 160  
Clackamas, OR 97015  
Phone: 503.305.2147  
Fax: 503.786.7877  
Web: [www.cleanharbors.com](http://www.cleanharbors.com)

April 28, 2010

Mr. Tom King  
General Manager  
Clean Harbors Environmental Services  
Seatac, Washington

**RE: Alaskan Copper Works TRI Reporting for 2008 and 2009**

Mr. King,

You have requested information pertaining to past SARA Title III reporting services conducted by Clean Harbors on behalf of Alaskan Copper Works (ACW) in Seattle, Washington. Until recently Clean Harbors prepared and submitted Annual Washington State Dangerous Waste Reports, Pollution Reduction Plan (P2) base year and annual updates, EPCRA TRI reports, Stormwater quarterly discharge monitoring reports (DMR's) and a variety of on-site compliance auditing services. Clean Harbors assumed ACW services from Romic Environmental Services (RET) in February 2008.

You are specifically inquiring about whether or not EPCRA Section 313 form R or A reports were submitted to EPA for 2008 and 2009. Section 313 requires manufacturing facilities, like ACW, to submit an annual toxic chemical release report for specified chemicals used in manufacturing and processing in amounts greater than threshold quantities. An annual Form R report covers releases and transfers of toxic chemicals to various facilities and environmental media, and allows EPA to compile the national Toxic Release Inventory (TRI) database.

Be advised that no annual reports were filed with EPA during the 2008 by RET and 2009 by Clean Harbors. This was based on a 2008 RET review of all reportable chemical substances used by ACW and specifically chromium which is contained in purchased bulk stainless steel stock and then cut or reshaped as finished a product.

During 2008 RET began reducing the chromium VI content in ACW's stainless steel cuttings or (slag) within the manufacturing process to remove a RCRA waste code (D007) and allow for de-regulation of the waste slag for recycling.

During testing of the chromium VI and III content, RET apparently determined that the chromium III content was less than 1.0% or less than 10,000 parts per million (ppm) with chromium VI content less than 0.01 % or less than 100 ppm. RET used this data as the basis for determining threshold quantities noted in table II of the EPCRA section 313 chemical list as it applies to grinding and cutting operations involving chromium compounds.

*"People and Technology Creating a Better Environment"*

AKC-0026124



During the 2008 Clean Harbors acquisition of RET assets, ACW customer files prior to February 2008 were shipped to RET in Houston, TX. Clean Harbors has only partial or incomplete RET documentation prior to 2009 reporting year but was made aware that RET submitted a memo of explanation to EPA on behalf of AWC for the 2008 reporting period.

Clean Harbors has conducted numerous testing on chromium VI content in ACW slag waste treated in 2008, 2009 and 2010. These tests reveal consistent low or non detectable levels of chromium VI which suggests validity in RET's threshold quantity determination for chromium.

Sincerely,

Matthew Dunn  
Clean Harbors Environmental Services  
Clackamas, Oregon

*"People and Technology Creating a Better Environment"*

**ALASKAN COPPER WORKS  
SEATTLE  
MASTER REPORTING FILE**

**General Correspondence  
Ecology Identifier  
Dangerous Waste Annual Reporting  
Stormwater Management Reporting  
SARA Title III 312 Tier II Reporting  
SARA Title III 313 FORM R Reporting  
Industrial Wastewater Permit Management  
Pollution Prevention Plan (P2) Reporting  
Fire Marshal Survey Reporting**

*Matthew Dunn*

503-786-7877

2125052375

1 Fri Jun 22 23:39:02 2007

ALASKAN COPPER WORKS,  
3200 5TH AVE. S.,  
SEATTLE, WA

Dear Manager:

Post-It™ brand fax transmittal memo 7671		# of pages ▶ 2
To <i>Matthew Dunn</i>	From <i>Jim Brown</i>	
Co. <i>Romic</i>	Co. <i>Alaskan Copper</i>	
Dept.	(b) (6)	
Fax # <i>503-786-7877</i>	Fax # <i>206-382-4309</i>	

I just reviewed a detailed, online description of your environmental emissions, and I am writing to express several important concerns. First, I understand that you have reported to the U.S. Environmental Protection Agency that your facility emitted:

265 pounds of total environmental releases in 2002  
23229 pounds of total production-related waste in 2002.

I was also surprised to learn that many of the toxic chemicals covered by EPA's reporting requirements do not have government-established safety levels, making it impossible for those of us who may be exposed to know whether present-day exposures are safe or not.

As a neighbor potentially affected by emissions from your facility, I ask you to provide me with information showing that these chemicals, and other chemicals which your facility produces and releases to the environment, are in fact safe.

Finally, I would like information on your efforts to prevent pollution in the first place by changing your use of these chemicals. Experience has shown that there are a number of process and product changes that can substantially reduce toxic chemical use and the generation of toxic chemical waste. If you do not have any in-house expertise in pollution prevention, are you taking advantage of state and private technical assistance in this area?

I look forward to your prompt response. The situation portrayed by your official reports to the U.S. EPA is not

2 Fri Jun 22 23:39:02 2007

reassuring to those of us who are, or may be, affected by  
chemicals that your facility is emitting.

Sincerely,

(b) (6)





May 7, 2007

Mr. Gerald Thompson  
Alaska Copper Works  
3200 6<sup>th</sup> Avenue S  
Seattle, Washington 98134  
FAX 206-382-4309

**RE: DEA Restricted Chemical Authorization List**

Dear Mr. Brown

You have requested ROMIC's assistance to determine any regulatory implications regarding the received DEA Letter of Compliance form sent to you by Cascade Columbia Dist.Co.

This form is required under the Chemical Diversion and Trafficking Act of 1988 and requires chemical distributors to notify and receive from buyers and purchasers all individuals who order and receive certain DEA controlled chemistries.

Based on your filled out form, you have identified five (5) Alaskan Copper and Brass employees who are authorized to order and receive MEK and Acetone.

You may return this completed form to the fax number indicated and you need not provide any additional information.

Be aware that the five individuals listed will be placed in the files of Cascade Columbia Dist.Co. Should there be an issue regarding misappropriated, stolen, or lost inventories, the DEA can require full disclosure of all sales and can investigate any buyer or purchaser indicated on these lists.

Please feel free to contact me should you have any additional questions.

Sincerely,

  
Matthew Dunn

(b) (6)



***Northwest Office***

14434 SE Industrial Way, Bldg. C ♦ Clackamas, OR 97015  
Local: 503.785.0404 ♦ Toll Free: 800.819.5912  
FAX: 503.786.7877

**FAX TRANSMITTAL**

Date: 5/8/07 Total Pages: 2 (Includes Cover Sheet)

TO: Mr. Gerald Thompson @ Alaska Copper Works

FAX : 206-382-4309

FROM: Matthew Dunn

☐ Urgent      ☐ Confidential      ☐ Original to follow      ☐ For Review

12/04/2005 15:15

27LE06483

TC:91458

REMOTE STATION	START	TIME	Pages	RESULT	REMARKS
12063824309	12-04 15:15	00:00 14	002/002	OK	

REMARKS TMR:Timer, POL:Poll, TRN:Turn around, 2IN:2in1 Tx, ORG:Original size set, DPG:Book Tx  
FME:Frame erase Tx, MIX:Mixed original, CALL:Manual-Com, KRDS:KRDS, FWD:FORWARD  
FLP:Flip Side 2, SP:Special Original  
FCODE:Fcode, MBX:Confidential, BUL:Bulletin, RLY:Relay, RTX:Re-Tx, PC:PC-FAX  
S-OK:Stop communication, Busy:Busy, Cont.:Continue, No ans:No answer  
M-full:Memory full, PW-OFF:Power switch OFF, TEL:Rx from TEL



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#### FAX TRANSMITTAL FRONT PAGE

**Date:** 12/4/06  
**Send To:** Jim Brown  
Alaskan Copper  
**Fax:** 206-382-4309  
**From:** Matthew Dunn  
ROMIC Environmental Technologies, Corp.  
**Subject:** Magnaflux Contaminated Rag Disposition  
**Comments:**  
**Call me at** (b) (6) **if you have further questions**  
**Matt**



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## **FAX TRANSMITTAL FRONT PAGE**

**Date:** 12/4/06

**Send To:** Jim Brown  
Alaskan Copper

**Fax:** 206-382-4309

**From:** Matthew Dunn  
ROMIC Environmental Technologies, Corp.

**Subject:** Magnaflux Contaminated Rag Disposition

**Comments:**

Call me at (b) (6) if you have further questions

**Matt**

December 4, 2006

Mr. Jim Brown  
Alaska Copper Works  
3200 6<sup>th</sup> Avenue S  
Seattle, Washington 98134

**RE: Waste Ink Contaminated Rags**

Dear Mr. Brown

You have asked how Alaskan Copper Works is to properly handle used Magnaflux contaminated rags.

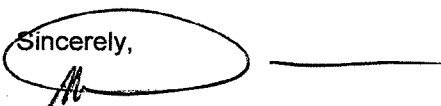
Here is your answer.

Based on MSDS information for all three Magnaflux products the only hazardous ingredient under RCRA is the characteristic hazard of ignitibility (D001). If rags are allowed to dry out or rinsed in water they should longer exhibit this characteristic and may be dispensed with general refuse so long as there are no free liquids involved.

You may dry the rags in a well ventilated area or soak in soapy water, rinse, then ring damp dry, and reuse or throw away with general trash.

Please feel free to contact me should you have any additional questions.

Sincerely,



Matthew Dunn  
(b) (6)

**Regulatory Reference,  
49CFR Part 260.4**

## Transmit report

P.1

11/14/2005 13:00  
27LE06483  
TC:87627

REMOTE STATION	START	TIME	Pages	RESULT	REMARKS
12063824309	11-14 12:58	00:01 05	006/006	OK	

REMARKS TMR:Timer, POL:Poll, TRN:Turn around, 2IN:2in1 Tx, ORG:Original size set, DPG:Book Tx  
FME:Frame erase Tx, MIX:Mixed original, CALL:Manual-Com, KRDS:KRDS, FWD:FORWARD  
FLP:Flip Side 2, SP:Special Original  
FCODE:Fcode, MBX:Confidential, BUL:Bulletin, RLY:Relay, RTX:Re-Tx, PC:PC-FAX  
S-OK:Stop communication, Busy:Busy, Cont.:Continue, No ans:No answer  
M-full:Memory full, PW-OFF:Power switch OFF, TEL:Rx from TEL



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**FAX TRANSMITTAL FRONT PAGE**

**Date:** 11/13/06  
**Send To:** Jim Brown  
Alaskan Copper Works  
**Fax:** 206-382-4309  
**From:** Matthew Dunn  
ROMIC Environmental Technologies, Corp.  
**Subject:** Waste Chrome Slag Treatment Proposal

**Comments:** Please review. If you wish to proceed then please forward a PO for the bench testing portion of the proposal only.

AKC-0026134



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## **FAX TRANSMITTAL FRONT PAGE**

**Date:** 11/13/06

**Send To:** Jim Brown  
Alaskan Copper Works

**Fax:** 206-382-4309

**From:** Matthew Dunn  
ROMIC Environmental Technologies, Corp.

**Subject:** Waste Chrome Slag Treatment Proposal

**Comments:** Please review. If you wish to proceed then please forward a PO for the bench testing portion of the proposal only.

November 2, 2006

Mr. Jim Brown  
Alaska Copper Works  
3200 6<sup>th</sup> Avenue S  
Seattle, Washington 98134

**RE: Chrome Slag Toxicity Reduction Proposal**

Dear Mr. Brown

As discussed with you previously, ROMIC is proposing to develop and implement a cost and time effective means for Alaskan Copper Works to treat cutting table slag resulting in a NON-RCRA regulated waste stream and suitable for landfill or recycling.

ROMIC has received representative samples from Gerald Thompson and is prepared to conduct initial bench testing on the chrome slag waste.

ROMIC recently met with the Washington Department of Ecology (Ecology) and has received acceptance of this proposed treatment process.

With your approval and notice to proceed, ROMIC will conduct the following actions. (See cost and warranty section on pages 4 and 5)

**Bench Testing**

The bench testing will consist of adding a prepared chemical reagent(s) to two representative chrome slag waste samples. The treated samples will be tested along with, along with two other samples of un-treated waste. This should take between 2 and 3 weeks.

**Pilot Testing**

Should the results reveal a decrease in chrome VI, a pilot test will be conducted at the next cutting table waste removal event. A comparative amount of liquid reagent will be introduced to the waste slag after sufficient dewatering and immediately proceeding vacuuming into the mobile vacuum truck.

Treatment occurs when the reagent is mixed in with the slag in the suction line and before the slag reaches the vacuum truck. Treatment should be instantaneous and irreversible.

The slag will be handled as before. Several waste containers will be randomly sampled and tested for chrome IV and other heavy metals.



## Recycling

If satisfactory results are received, ROMIC will recommend continual dewatering as before but that the chrome waste slag be handled as NON-RCRA solid waste.

ROMIC will contact potential users of the waste slag in the local Seattle area and forward testing data accordingly. Potential users include concrete manufacturers who can use metal grit to reinforce concrete.

It is likely that an acceptance cost of between \$26.00 and \$36.00 per ton of waste slag will apply not including any transportation costs.

If no suitable end users are found, then Alaska Copper still has the option of landfilling at rate between \$45.00 and \$70.00 per ton including transportation. A reduced disposal rate may be found since the material can also be used as a stabilizer in various applications,

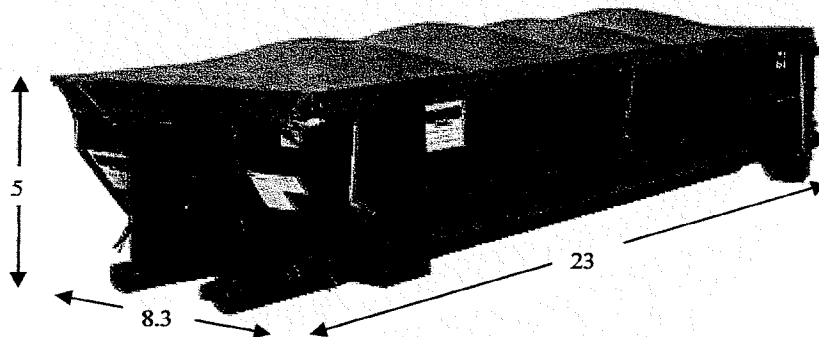
## Regulatory Compliance

ROMIC will communicate directly with Ecology regarding TBG (Treatment By Generator) regulatory conformity and will handle or compliance issues accordingly.

## Dewatering and Handling Issues

Since the slag contains considerable water, some on-site means of dewatering should be considered that will reduce physical labor and cost. Currently, the slag is pumped out of the cutting table and then funneled into 55 gallon containers. These containers are then periodically dewatered by hand. This process is labor intensive, costly, and time consuming.

ROMIC recommends that Alaskan Copper look into procuring or renting a 10 yard metal box to contain a full load of treated slag that will promote bulk dewatering. There would need to be some modification made to the box that would allow complete drainage of water. The box would have to have a side profile of less than 43 inches to accommodate standard tip dumping from a vacuum truck.



Typical de-watering box that can be rented or leased and can be used for dewatering slag. Boxes like this have a screen plate running the length of the bottom with valves to drain liquid. The lowest profile for a box like this is 5 feet.

If a bulk means to dewater can be developed the resulting benefits would include;

- Safer
- No more single trip waste container purchases
- Significant reduction in labor and time to handle the waste slag for dewatering
- A dedicated box that can be shipped directly to the landfill or recycler and returned
- Allows up to a year's worth of waste slag storage (dewatering)

There is ample time to further investigate handling treated waste. Keep in mind that there would be no time limit in respect to on-site storage once the slag has been treated.

### **General Treatment Concept**

The chemical treatment to be used for the chrome slag is based on mineralization or formation of apatite followed by isomorphic interchange.

Simply put, this entails substituting one part of an apatite mineral with another. In this case, calcium with chrome.

When in chemical constituents for apatite come together in the presence of chromium ions, the chrome is taken up as part of the mineral (not just encased). The treatment is instantaneous and irreversible.



This method of treating heavy metals has been used in a number of applications with great success and is consistent with approved treatment methodologies under existing Washington State treatment standards.

## Proposal Costs

ROMIC has in place established costs for conducting technical work of this nature with Alaskan Copper. The schedule of costs to conduct the bench testing, pilot test and associated lab testing is as follows.

### Bench Testing (Phase 1)

To be conducted and completed before next scheduled cutting table clean out

Regulatory and Technical Assistance	Mix Design and Bench Testing	95.00/hr	4 hours	380.00
Labor	Sample Delivery	47.50/hr	2 hours	95.00
Lab testing From Bench Test	TCLP RCRA 8 metals	225.00/each	4 tests	900.00
<b>Total Costs for Bench Testing</b>				<b>\$1,375.00</b>

### Pilot Testing (Phase 2)

To be conducted during next cutting table clean out

Labor	Site Pilot Testing	47.50	8 hours	380.00
Labor	Sample Delivery	47.50/hr	2 hours	95.00
Lab testing From Pilot Test	TCLP RCRA 8 metals	225.00/each	3 tests	675.00
<b>Total Costs for Pilot Testing</b>				<b>\$1,150.00</b>

## Warranties and Reagent Application

ROMIC will bill for bench testing services only after the results is shown to be successful.

1. There is a reduction in TCLP chrome to below regulator levels or,
2. Reduction in chrome compared to un-treated samples.

If bench testing is unsuccessful Alaskan Copper will only be billed for laboratory testing charges.

ROMIC will bill for pilot testing services only after the results is shown to be successful.

1. There is a reduction in TCLP chrome to below regulator levels or,
2. Reduction in chrome compared to un-treated samples.

ROMIC will also charge for subsequent reagent mix formulations. Until ROMIC determines the actual mix, this price can not be calculated at this time. The mix formulation is made by ROMIC and has a limited shelf life. For purposes of budgeting to prepare a 5 gallon mixture (generally to amount used for each table cleaning/treatment process the price may range from \$75.00 to \$150.00 per 5 gallon container.

ROMIC will provide instructions for use including MSDS for the reagent should Alaskan Copper elect to do the treatment in house.

In closing, it is our pleasure to serve Alaskan Copper Works. It is my hope you find this proposal satisfactory and that you can secure a Purchase Order for the Bench Testing Phase at your earliest convenience

Please feel free to contact me should you have any additional questions.

Sincerely,

Matthew Dunn

(b) (6)

Fax 503-786-7877

Acknowledgement

---

Signature

Date

PO



14344 SE Industrial Way, Bldg C, Clackamas, Oregon 97015 • Phone 503.785.0404 • Fax 503.786.7877

## **FAX TRANSMITTAL FRONT PAGE**

**Date:** 11/13.06

**Send To:** Jim Brown  
Alaskan Copper Works

**Fax:** 206-382-4309

**From:** Matthew Dunn  
ROMIC Environmental Technologies, Corp.

**Subject:** October Planning Service Charges

**Comments:** I am not sure if I had sent this to you before. Could you look at this and see if a PO has been issued?



4500 15<sup>th</sup> St. E., Unit A • Tacoma, WA 98424 • Phone 253.926.0580, Fax 253.926.0599

October 31, 2006

Mr. Jim Brown  
Alaska Copper Works  
3200 6<sup>th</sup> Avenue S  
Seattle, Washington 98134

**RE: Review of Environmental Management Activities**

Dear Mr. Brown

ROMIC Environmental Technologies, Corp has completed and addressed the following assignments and requests relating to environmental and employee health and safety services on your behalf.

**Washington Services**

1. Submittal of Slug/Discharge Plan to King County.
2. Modification of the existing industrial wastewater permit to include ink waste to King County.
3. Collection of stormwater discharge monitoring and database development. Starting with the 4<sup>th</sup> quarter ROMIC will submit all future DMR's to DOE.
4. Submittal of Year end 2005 P2 plan to DOE.
5. Response to inquiry regarding chromium IV management requirements.
6. Response to inquiry regarding DOT hazardous waste security plan requirements.
7. Letter of clarification of ROMIC services included in monthly flat rate fees


Currently, ROMIC is developing a comprehensive waste chrome (D007) reduction plan that should eliminate chrome slag waste as a D007 and suitable for non RCRA waste recycling. Please refer to document sent on October 17, 2006 under Pollution Prevention Planning. ROMIC will be submitting a written proposal with all associated costs pertaining to testing and implementation of chrome treatment.

**Oregon Services**

8. Portland Alaskan Copper and Brass compliance assistance (See attached DEQ letter)
9. Portland Alaskan Copper and Brass waste management training course
10. Portland Alaskan Copper and Brass SPCC plan development and implementation

Please find and review the attached charges for items 4, 5, and 6. All other services indicated above are part of the monthly flat rate or have already been invoiced separately. Please provide a PO for the services indicated on the attached service charge sheet.

Sincerely,

  
Matthew Dunn  
(b) (6)



**ROMIC**  
ENVIRONMENTAL  
TECHNOLOGIES CORP.

## SERVICE CHARGE SHEET

**Customer:** Alaskan Copper Works  
**Project #:** 4578  
**PO#:** Pending  
**Comments:**

**Customer #:** AC (S)  
**Status:** Complete  
**Sales:** Leff  
**Project Start:** 10/1/2006

Date	Labor/Description	Meas.	EXT	Rate	Charge
10/19/2006	Discharge Permit Modification to King County	Hr	2	\$95.00	\$190.00
10/27/2006	P2 Plan update Submittal to Ecology	Hr	4	\$95.00	\$380.00
10/31/2006	Chrome Management Inquiry Response	Hr	1	\$95.00	\$95.00
10/31/2006	DOT Security Response	Hr	0.5	\$95.00	\$47.50
<b>Equipment</b>		<b>Meas.</b>	<b>EXT</b>	<b>Rate</b>	<b>Charge</b>
<b>Material Purchases</b>		<b>Meas.</b>	<b>EXT</b>	<b>Rate</b>	<b>Charge</b>
<b>Contracted Services</b>		<b>Meas.</b>	<b>EXT</b>	<b>Rate</b>	<b>Charge</b>
<b>Administration</b>		<b>Meas.</b>	<b>EXT</b>	<b>Rate</b>	<b>Charge</b>

<b>Price</b>	<b>\$712.50</b>
--------------	-----------------

Bill to  
Alaska Copper Works  
Accounts Payable  
PO Box  
3546  
Seattle, WA 98124



14344 SE Industrial Way, Bldg C, Clackamas, Oregon 97015 • Phone 503.785.0404 • Fax 503.786.7877

## **FAX TRANSMITTAL FRONT PAGE**

**Date:** 11/02/06

**Send To:** Jim Brown  
Alaskan Copper Works

**Fax:** 206-382-4309

**From:** Matthew Dunn  
ROMIC Environmental Technologies, Corp.

**Subject:** Waste Floorsweepings and Metal Grinding Waste Disposition

**Comments:** Please review and file in your Waste Management Folder. Keep this letter with analysis as supporting documentation.



## Transmit report

P.1

11/02/2005 08:49  
27LE06483  
TC:85865

REMOTE STATION	START	TIME	Pages	RESULT	REMARKS
12063824309	11-02 08:48	00:00 19	002/002	OK	

REMARKS TMR:Timer, POL:Poll, TRN:Turn around, 2IN:2in1 Tx, ORG:Original size set, DPG:Book Tx  
FME:Frame erase Tx, MIX:Mixed original, CALL:Manual-Com, KRDS:KRDS, FWD:FORWARD  
FLP:Flip Side 2, SP:Special Original  
FCODE:Fcode, MBX:Confidential, BUL:Bulletin, RLY:Relay, RTX:Re-Tx, PC:PC-FAX  
S-OK:Stop communication, Busy:Busy, Cont.:Continue, No ans:No answer  
M-full:Memory full, PW-OFF:Power switch OFF, TEL:Rx from TEL



14344 SE Industrial Way, Bldg C, Clackamas, Oregon 97015 • Phone 503.785.0404 • Fax 503.786.7877

**FAX TRANSMITTAL FRONT PAGE**

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**Fax:** 206-382-4309

**From:** Matthew Dunn  
ROMIC Environmental Technologies, Corp.

**Subject:** Waste Floorsweepings and Metal Grinding Waste Disposition

**Comments:** Please review and file in your Waste Management Folder. Keep this letter with analysis as supporting documentation.

AKC-0026145



4500 15<sup>th</sup> St. E., Unit A • Tacoma, WA 98424 • Phone 253.926.0580, Fax 253.926.0599

November 2, 2006

Mr. Jim Brown  
Alaska Copper Works  
3200 6<sup>th</sup> Avenue S  
Seattle, Washington 98134

**RE: Metal Grinding and Floorsweeping Waste Disposition**

Dear Mr. Brown

You have asked how Alaskan Copper Works should compliantly handling metal grinding and Floorsweeping debris. Here is your answer.

Under federal and state law, industrial and commercial waste generators must identify all solids wastes and determine if the waste is subject to dangerous or hazardous waste regulations. Alaskan Copper Works recently collected representative samples of floorsweepings and metal grinding waste from the following three separate process locations to determine appropriate waste characterization.

1. Main Floor
2. Core Area
3. Heavy Grinding

These samples were submitted to a state certified laboratory and tested for heavy metals using EPA test method 6010B/1311(TCLP). The test results for all three samples indicate that TCLP levels of all RCRA 8 metals are well below the maximum concentration levels established by regulation and therefore are not considered a dangerous and hazardous waste.

In regards to disposition there is no state or federal regulation prohibiting disposal to subtitle D landfill. Since all public and commercial landfills in Washington meet Subtitle D definition, Alaskan Copper Works would be in full compliance by disposing metal grinding and floorsweepings along with general commercial trash.

Proper handling management would still apply which essentially requires Alaskan Copper Works to prevent spillage, uncontrolled release, or introduction onto the ground, waterways, or emissions. Also keep in mind that Alaskan copper Works should conduct verification testing on an annual basic or re-test should process parameters change.

Please feel free to contact me should you have any additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Dunn", is written over a horizontal line.

Matthew Dunn  
(b) (6)

**Regulatory Reference,**

**WAC 173-303-070**

**40CFR Subpart B**



14344 SE Industrial Way, Bldg C, Clackamas, Oregon 97015 • Phone 503.785.0404 • Fax 503.786.7877

## **FAX TRANSMITTAL FRONT PAGE**

**Date:** 11/01/06

**Send To:** Jim Brown  
Alaskan Copper Works

**Fax:** 206-382-4309

**From:** Matthew Dunn  
ROMIC Environmental Technologies, Corp.

**Subject:** King County Industrial Wastewater Discharge Modification  
Approval

**Comments:** Please review and file with your copy of the industrial waste  
discharge permit.

11/01/2005 08:33  
27LE06483  
TC:85720

REMOTE STATION	START	TIME	Pages	RESULT	REMARKS
12063824309	11-01 08:33	00:00 15	002/002	OK	

REMARKS TMR:Timer, POL:Poll, TRN:Turn around, 2IN:2in1 Tx, ORG:Original size set, DPG:Book Tx  
FME:Frame erase Tx, MIX:Mixed original, CALL:Manual-Com, KRDS:KRDS, FWD:FORWARD  
FLP:Flip Side 2, SP:Special Original  
FCODE:Fcode, MBX:Confidential, BUL:Bulletin, RLY:Relay, RTX:Re-Tx, PC:PC-FAX  
S-OK:Stop communication, Busy:Busy, Cont.:Continue, No ans:No answer  
M-full:Memory full, PW-OFF:Power switch OFF, TEL:Rx from TEL



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#### FAX TRANSMITTAL FRONT PAGE

**Date:** 11/01/06  
**Send To:** Jim Brown  
Alaskan Copper Works  
**Fax:** 206-382-4309  
**From:** Matthew Dunn  
ROMIC Environmental Technologies, Corp.  
**Subject:** King County Industrial Wastewater Discharge Modification  
Approval  
**Comments:** Please review and file with your copy of the industrial waste  
discharge permit.



**ROMIC**  
ENVIRONMENTAL  
TECHNOLOGIES CORP.

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## **FAX TRANSMITTAL FRONT PAGE**

**Date:** 10/31/06

**Send To:** Jim Brown  
Alaskan Copper Works

**Fax:** 206-382-4309

**From:** Matthew Dunn  
ROMIC Environmental Technologies, Corp.

**Subject:** Hazardous Waste Security Plan

**Comments:** Please review and comment should you have questions.

October 31, 2006

Mr. Jim Brown  
Alaska Copper Works  
3200 6<sup>th</sup> Avenue S  
Seattle, Washington 98134

**RE: Transportation Security Plan Requirements**

Dear Mr. Brown

You have asked if Alaskan Copper Works is subject to certain DOT transportation security requirements.

Here is your answer.

Under the requirements of 40CFR subpart I § 172.800 shippers (you) are required to develop and adhere to a security plan for hazardous materials and waste. This includes waste shipments of non bulk waste requiring placarding. The components of this written plan must include;

1. Measures to confirm information provided by job applicants haired for positions that involve access to and handling of hazardous materials and waste
2. Measures to address the assessed risk that unauthorized persons may gain access to the hazardous materials
3. Measures to address the assessed security risks of shipments of hazardous wastes

The plan must be in writing and retained for as long as it remains in effect. Copies of the plan must be available to employees who are responsible for implementing the plan

This is a Federal Department of Transportation requirement mandated by Homeland Security.

ROMIC can develop a written master plan for all Alaskan Copper Works and (Brass Co) facilities where placarded waste is shipped from.

Please feel free to contact me should you wish for ROMIC to produce this plan or have any additional questions.

Sincerely,



Matthew Dunn

(b) (6)

**Regulatory Reference,  
49CFR Part 172.800**

(c) *Initial and recurrent training*—(1) *Initial training.* A new hazmat employee, or a hazmat employee who changes job functions may perform those functions prior to the completion of training provided—

(i) The employee performs those functions under the direct supervision of a properly trained and knowledgeable hazmat employee; and

(ii) The training is completed within 90 days after employment or a change in job function.

(2) *Recurrent training.* A hazmat employee shall receive the training required by this subpart at least once every three years.

(3) *Relevant Training.* Relevant training received from a previous employer or other source may be used to satisfy the requirements of this subpart provided a current record of training is obtained from hazmat employees' previous employer.

(4) *Compliance.* Each hazmat employer is responsible for compliance with the requirements of this subchapter regardless of whether the training required by this subpart has been completed.

(d) *Recordkeeping.* A record of current training, inclusive of the preceding three years, in accordance with this section shall be created and retained by each hazmat employer for as long as that employee is employed by that employer as a hazmat employee and for 90 days thereafter. The record shall include:

(1) The hazmat employee's name;

(2) The most recent training completion date of the hazmat employee's training;

(3) A description, copy, or the location of the training materials used to meet the requirements in paragraph (a) of this section;

(4) The name and address of the person providing the training; and

(5) Certification that the hazmat employee has been trained and tested, as required by this subpart.

(e) *Limitation.* A hazmat employee who repairs, modifies, reconditions, or tests packagings as qualified for use in the transportation of hazardous materials, and who does not perform any other function subject to the requirements of this subchapter, is not subject

to the safety training requirement of paragraph (a)(3) of this section.

[Amdt. 172-126, 57 FR 20952, May 15, 1992, as amended by Amdt. 172-126, 58 FR 5851, Jan. 22, 1993; Amdt. 172-145, 60 FR 49110, Sept. 21, 1995; Amdt. 172-149, 61 FR 27173, May 30, 1996; 65 FR 50460, Aug. 18, 2000; 68 FR 14521, Mar. 25, 2003]

### Subpart I—Security Plans

SOURCE: 68 FR 14521, Mar. 25, 2003, unless otherwise noted.

#### § 172.800 Purpose and applicability.

(a) *Purpose.* This subpart prescribes requirements for development and implementation of plans to address security risks related to the transportation of hazardous materials in commerce.

(b) *Applicability.* By September 25, 2003, each person who offers for transportation in commerce or transports in commerce one or more of the following hazardous materials must develop and adhere to a security plan for hazardous materials that conforms to the requirements of this subpart:

(1) A highway route-controlled quantity of a Class 7 (radioactive) material, as defined in §173.403 of this subchapter, in a motor vehicle, rail car, or freight container;

(2) More than 25 kg (55 pounds) of a Division 1.1, 1.2, or 1.3 (explosive) material in a motor vehicle, rail car, or freight container;

(3) More than one L (1.06 qt) per package of a material poisonous by inhalation, as defined in §171.8 of this subchapter, that meets the criteria for Hazard Zone A, as specified in §§173.116(a) or 173.133(a) of this subchapter;

(4) A shipment of a quantity of hazardous materials in a bulk packaging having a capacity equal to or greater than 13,248 L (3,500 gallons) for liquids or gases or more than 13.24 cubic meters (468 cubic feet) for solids;

(5) A shipment in other than a bulk packaging of 2,268 kg (5,000 pounds) gross weight or more of one class of hazardous materials for which placarding of a vehicle, rail car, or freight container is required for that class under the provisions of subpart F of this part;

## § 172.802

- (6) A select agent or toxin regulated by the Centers for Disease Control and Prevention under 42 CFR part 73; or
- (7) A quantity of hazardous material that requires placarding under the provisions of subpart F of this part.

### § 172.802 Components of a security plan.

(a) The security plan must include an assessment of possible transportation security risks for shipments of the hazardous materials listed in § 172.800 and appropriate measures to address the assessed risks. Specific measures put into place by the plan may vary commensurate with the level of threat at a particular time. At a minimum, a security plan must include the following elements:

(1) *Personnel security.* Measures to confirm information provided by job applicants hired for positions that involve access to and handling of the hazardous materials covered by the security plan. Such confirmation system must be consistent with applicable Federal and State laws and requirements concerning employment practices and individual privacy.

(2) *Unauthorized access.* Measures to address the assessed risk that unauthorized persons may gain access to the hazardous materials covered by the security plan or transport conveyances being prepared for transportation of the hazardous materials covered by the security plan.

(3) *En route security.* Measures to address the assessed security risks of shipments of hazardous materials covered by the security plan en route from origin to destination, including shipments stored incidental to movement.

(b) The security plan must be in writing and must be retained for as long as it remains in effect. Copies of the security plan, or portions thereof, must be available to the employees who are responsible for implementing it, consistent with personnel security clearance or background investigation re-

## 49 CFR Ch. I (10-1-05 Edition)

strictions and a demonstrated need to know. The security plan must be revised and updated as necessary to reflect changing circumstances. When the security plan is updated or revised, all copies of the plan must be maintained as of the date of the most recent revision.

### § 172.804 Relationship to other Federal requirements.

To avoid unnecessary duplication of security requirements, security plans that conform to regulations, standards, protocols, or guidelines issued by other Federal agencies, international organizations, or industry organizations may be used to satisfy the requirements in this subpart, provided such security plans address the requirements specified in this subpart.

#### APPENDIX A TO PART 172—OFFICE OF HAZARDOUS MATERIALS TRANSPORTATION COLOR TOLERANCE CHARTS AND TABLES

The following are Munsell notations and Commission Internationale de L'Eclairage (CIE) coordinates which describe the Office of Hazardous Materials Transportation Label and Placard Color Tolerance Charts in tables 1 and 2, and the CIE coordinates for the color tolerances specified in table 3. Central colors and tolerances described in table 2 approximate those described in table 1 while allowing for differences in production methods and materials used to manufacture labels and placards surfaced with printing inks. Primarily, the color charts based on table 1 are for label or placard colors applied as opaque coatings such as paint, enamel or plastic, whereas color charts based on table 2 are intended for use with labels and placards surfaced only with inks.

For labels printed directly on packaging surfaces, table 3 may be used, although compliance with either table 1 or table 2 is sufficient. However, if visual reference indicates that the colors of labels printed directly on package surfaces are outside the table 1 or 2 tolerances, a spectrophotometer or other instrumentation may be required to insure compliance with table 3.





**ROMIC**  
ENVIRONMENTAL  
TECHNOLOGIES CORP.

14344 SE Industrial Way, Bldg C, Clackamas, Oregon 97015 • Phone 503.785.0404 • Fax 503.786.7877

## **FAX TRANSMITTAL FRONT PAGE**

**Send To:** Jim Brown  
Alaskan Copper Works

**Fax:** 206-382-4309

**From:** Matthew Dunn  
ROMIC Environmental Technologies, Corp.

**Subject:** Chromium Management Information

**Comments:** Please review and comment should you have questions.

October 31, 2006

Mr. Jim Brown  
Alaska Copper Works  
3200 6<sup>th</sup> Avenue S  
Seattle, Washington 98134

**RE: Hexavalent Chrome Management**

Dear Mr. Brown

You have asked how Washington state hexavalent chromium management requirements affect your operations.

Here is your answer.

A Washington Labor and Industry General Occupational Health standard applies to occupational exposures to chromium (VI) in all forms in general industry to include manufacturing.

Essentially the standard requires you to have a program in place that protects employees from exposure to chromium (IV) compounds in concentrations at or above 0.5 (mu)g/m<sup>3</sup> as an 8-hour time-weighted average.

Keep in mind that we are talking about airborne exposure - not chromium IV on the ground, in slag, or in waste piles. The recent TCLP analysis you provided me last week does not provide information that would help determine chromium IV airborne concentrations at the Alaskan Copper workplace.

There is an exception to this requirement if you can demonstrate that there is no likelihood of airborne contamination at or above the minimum level to be present in any of the work areas where work involving the grinding, cutting, or welding of stainless steel containing chromium is conducted.

I contacted Laucks Testing Labs earlier today and determined that they had not provided you with appropriate test results. They re-submitted corrected results to me yesterday and I have enclosed the corrected results for your file. Based on the corrected results for TCLP chrome I have concluded that under typical working conditions you would not have measurable airborne concentrations exceeding the above standard.

To ensure that you are not subject to these regulations, I would recommend good housekeeping practices to ensure that no significant accumulations of grinding waste are generated or that can be kicked up, tracked or spread resulting in potentially regulated airborne concentrations. In short, you would not have to conduct air sampling to determine chromium IV concentrations in the work place so long as you maintain a high housekeeping standard.

Your housekeeping program should entail safe and non-intrusive means to clean up dry grinding residues and small particles on a regular basis. You may want to consider ways to keep grindings and small particles wet or moist, ways to avoid breathing dust and grit such as maintaining good ventilation, and vacuuming up dust and grit with a HEPA filter wet/dry vacuum rather than sweeping.

There are a number of methods available that should give you a high level of confidence that your employees are not exposed to chrome IV dust and particulates. ROMIC is available to assist you and your staff should you decide to develop a housekeeping program or have your interior workplace air quality environment tested.

Please feel free to contact me should you have any additional questions.

Sincerely,



Matthew Dunn  
(b) (6)

**Regulatory Reference,  
WAC 296-62-08003 through 008029, Parts I-2**

# Laucks

## Testing Laboratories, Inc.

940 South Harney St.

Seattle, WA 98108

(206) 767-5060 FAX (206) 767-5063

### FAX Cover Sheet

**To:** Mathew Dunn  
**Company:** Alaska Copper  
**From:** Pam Johnson  
**SDG:** ACOP061001

**FAX Number:** (503)786-7877  
**Date:** 10/30/06  
**No. of Pages (including cover page):** 14

Hi Mathew,

Here are results for the sample received on 10/02/06. Please call if you have any questions. My direct line is (206) 957-2440.

Thank you,

Pam

FAX cover

# Laucks

## Testing Laboratories, Inc.

940 South Flanery St., Seattle, WA 98108 (206) 767-5060 FAX (206) 767-5063 [www.lauckslabs.com](http://www.lauckslabs.com)

### Certificate of Analysis

Client: Alaskan Copper Works  
PO Box 3546  
Seattle, WA 98124-3546

ATTN: Bob McMahon

Work ID: Floor Sweeping Test

Taken By: CLIENT

Transported By: HAND DELIVERED

SDG Number: ACOP061001

Date Received: 10/02/2006

Date Reported: 10/30/2006

Client Job ID: M-108817

#### Sample Identification:

Lab Sample ID	Sample Description	Collection Date/Time		Type
ACOP061001-001	Main Floor	10/02/2006	13:30	Soil
ACOP061001-002	Core Area	10/02/2006	13:30	Soil
ACOP061001-003	Heavy Grinding	10/02/2006	13:30	Soil

#### Flagging:

J = The value reported is below the routine reporting limit and should be considered an estimate

U = The analyte of interest was not detected, to the limit of detection indicated

#### Comments:

This is a REVISED Report II. 10/30/06.

Email results to [rtm@alascop.com](mailto:rtm@alascop.com)

#### MATRIX SPIKE ANALYSIS:

The MS recoveries for arsenic, selenium, silver and mercury fell outside the normal control limits. Since all other QC was in control, no further action was taken.

This report is submitted for the exclusive use of the person, partnership, or corporation to whom it is addressed. Subsequent use of the name of this company or any member of its staff in connection with advertising or sale of any product or process will be granted only on contract. This company accepts no responsibility except for the performance of inspection and/or analysis in good faith and according to the rules of trade and science.

# Laucks

## Testing Laboratories, Inc.

940 South Harney St., Seattle, WA 98108 (206) 767-5060 FAX (206) 767-5063 [www.lauckslabs.com](http://www.lauckslabs.com)

Unless otherwise instructed all samples with the exception of samples which are consumed during the analysis, such as microbiological samples, will be disposed of on or after 11/30/06

Respectfully submitted,  
Laucks Testing Laboratories, Inc.

J.M. Owens

This report is submitted for the exclusive use of the person, partnership, or corporation to whom it is addressed. Subsequent use of the name of this company or any member of its staff in connection with advertising or sale of any product or process will be granted only on contract. This company accepts no responsibility except for the performance of inspection and/or analysis in good faith and according to the rules of trade and science.

(c) *Initial and recurrent training*—(1) *Initial training.* A new hazmat employee, or a hazmat employee who changes job functions may perform those functions prior to the completion of training provided—

(i) The employee performs those functions under the direct supervision of a properly trained and knowledgeable hazmat employee; and

(ii) The training is completed within 90 days after employment or a change in job function.

(2) *Recurrent training.* A hazmat employee shall receive the training required by this subpart at least once every three years.

(3) *Relevant Training.* Relevant training received from a previous employer or other source may be used to satisfy the requirements of this subpart provided a current record of training is obtained from hazmat employees' previous employer.

(4) *Compliance.* Each hazmat employer is responsible for compliance with the requirements of this subchapter regardless of whether the training required by this subpart has been completed.

(d) *Recordkeeping.* A record of current training, inclusive of the preceding three years, in accordance with this section shall be created and retained by each hazmat employer for as long as that employee is employed by that employer as a hazmat employee and for 90 days thereafter. The record shall include:

(1) The hazmat employee's name;

(2) The most recent training completion date of the hazmat employee's training;

(3) A description, copy, or the location of the training materials used to meet the requirements in paragraph (a) of this section;

(4) The name and address of the person providing the training; and

(5) Certification that the hazmat employee has been trained and tested, as required by this subpart.

(e) *Limitation.* A hazmat employee who repairs, modifies, reconditions, or tests packagings as qualified for use in the transportation of hazardous materials, and who does not perform any other function subject to the requirements of this subchapter, is not subject

to the safety training requirement of paragraph (a)(3) of this section.

[Amdt. 172-126, 57 FR 20952, May 15, 1992, as amended by Amdt. 172-126, 58 FR 5851, Jan. 22, 1993; Amdt. 172-145, 60 FR 49110, Sept. 21, 1995; Amdt. 172-149, 61 FR 27173, May 30, 1996; 65 FR 50460, Aug. 18, 2000; 68 FR 14521, Mar. 25, 2003]

### Subpart I—Security Plans

SOURCE: 68 FR 14521, Mar. 25, 2003, unless otherwise noted.

#### § 172.800 Purpose and applicability.

(a) *Purpose.* This subpart prescribes requirements for development and implementation of plans to address security risks related to the transportation of hazardous materials in commerce.

(b) *Applicability.* By September 25, 2003, each person who offers for transportation in commerce or transports in commerce one or more of the following hazardous materials must develop and adhere to a security plan for hazardous materials that conforms to the requirements of this subpart:

(1) A highway route-controlled quantity of a Class 7 (radioactive) material, as defined in § 173.403 of this subchapter, in a motor vehicle, rail car, or freight container;

(2) More than 25 kg (55 pounds) of a Division 1.1, 1.2, or 1.3 (explosive) material in a motor vehicle, rail car, or freight container;

(3) More than one L (1.06 qt) per package of a material poisonous by inhalation, as defined in § 171.8 of this subchapter, that meets the criteria for Hazard Zone A, as specified in §§ 173.116(a) or 173.133(a) of this subchapter;

(4) A shipment of a quantity of hazardous materials in a bulk packaging having a capacity equal to or greater than 13,248 L (3,500 gallons) for liquids or gases or more than 13.24 cubic meters (468 cubic feet) for solids;

(5) A shipment in other than a bulk packaging of 2,268 kg (5,000 pounds) gross weight or more of one class of hazardous materials for which placarding of a vehicle, rail car, or freight container is required for that class under the provisions of subpart F of this part;

# Laucks <sup>Since</sup> 1908

## Testing Laboratories, Inc.

940 South Harney St., Seattle, WA 98108 (206) 767-5060 FAX (206) 767-5063 www.lauckslabs.com

### TCLP Results

Lab Sample ID: ACOP061001-002Client Sample ID: Core AreaDate Received: 10/02/2006Collection Date: 10/02/2006Date Extracted: 10/09/2006Concentration Units: mg/L

EPA HW #	Analyte	Result	MCL	Run Sequence	Analysis Date
D009	Mercury	0.00500 U	0.2	R011249	10/10/2006
D004	Arsenic	0.200 U	5	R011590	10/18/2006
D005	Barium	0.663	100	R011590	10/18/2006
D006	Cadmium	0.100 U	1	R011590	10/18/2006
D007	Chromium	1.26	5	R011590	10/18/2006
D008	Lead	0.100 U	5	R011590	10/18/2006
D010	Selenium	0.200 U	1	R011590	10/18/2006
D011	Silver	0.100 U	5	R011590	10/18/2006

MCL = Maximum Contamination Level, as established by regulation.

EPA HW # = EPA Hazardous Waste Number

FORM LTL-RSR-37.0(LTR)



# Laucks <sup>Since 1908</sup>

## Testing Laboratories, Inc.

940 South Hamley St., Seattle, WA 98108 (206) 767-5060 FAX (206) 767-5063 www.lauckslabs.com

### TCLP Results

Lab Sample ID: ACOP061001-003Client Sample ID: Heavy GrindingDate Received: 10/02/2006Collection Date: 10/02/2006Date Extracted: 10/09/2006Concentration Units: mg/L

EPA HW #	Analyte	Result	MCL	Run Sequence	Analysis Date
D009	Mercury	0.00500 U	0.2	R011249	10/10/2006
D004	Arsenic	0.200 U	5	R011590	10/18/2006
D005	Barium	0.492	100	R011590	10/18/2006
D006	Cadmium	0.0122 J	1	R011590	10/18/2006
D007	Chromium	0.798	5	R011590	10/18/2006
D008	Lead	0.100 U	5	R011590	10/18/2006
D010	Selenium	0.200 U	1	R011590	10/18/2006
D011	Silver	0.100 U	5	R011590	10/18/2006

MCL -- Maximum Contamination Level, as established by regulation.

EPA HW # = EPA Hazardous Waste Number

FORM LTL-RSR-37.0(LTR)

# Laucks

Testing Laboratories, Inc.

940 South Harney St., Seattle, WA 98108 (206) 767-5060 FAX (206) 767-5063 www.lauckslabs.com

## TCLP Results

Lab Sample ID: ACOP061001-001

Client Sample ID: Main Floor

Date Received: 10/02/2006

Collection Date: 10/02/2006

Date Extracted: 10/09/2006

Concentration Units: mg/L

EPA HW #	Analyte	Result	MCL	Run Sequence	Analysis Date
D009	Mercury	0.00500 U	0.2	R011249	10/10/2006
D004	Arsenic	0.200 U	5	R011590	10/18/2006
D005	Barium	0.405	100	R011590	10/18/2006
D006	Cadmium	0.100 U	1	R011590	10/18/2006
D007	Chromium	0.817	5	R011590	10/18/2006
D008	Lead	0.100 U	5	R011590	10/18/2006
D010	Selenium	0.200 U	1	R011590	10/18/2006
D011	Silver	0.100 U	5	R011590	10/18/2006

MCL = Maximum Contamination Level, as established by regulation.

EPA HW # = EPA Hazardous Waste Number

FORM LTL-RSR-37.0(LTR)

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AKC-0026162

# Laucks <sup>Since 1908</sup>

## Testing Laboratories, Inc.

940 South Harney St., Seattle, WA 98108 (206) 767-5060 FAX (206) 767-5063 www.lauckslabs.com

### Laucks Testing Laboratories

### Matrix Spike Report

Test: 6010B Metals TCLP-7 Extract (Soil or Water) SDG ID: ACOP061001  
 Preparation Date: 10/09/2006  
 Lab Sample ID: ACOP061001-003MS Run Sequence ID: R011590  
 Client Sample ID: Heavy GrindingMS Analysis Date: 10/18/2006 9:08:00PM  
 Units: mg/L  
 Matrix: Soil

Analyte	Sample Found	Spike Added	MS Found	Recovery	Limit
Arsenic	0	2.00	4.1983	210%*	75-125
Barium	0.492	2.00	2.5222	102%	75-125
Cadmium	0.0122	0.0500	0.0607	97%	75-125
Chromium	0.7979	0.200	0.9524	77%	75-125
Lead	0.0324	0.500	0.5426	102%	75-125
Selenium	0.0163	2.00	3.2471	162%*	75-125
Silver	0	0.0500	0.4241	848%*	75-125

Associated Samples	
Lab Sample ID	Client Sample ID
ACOP061001-001	Main Floor
ACOP061001-002	Core Area
ACOP061001-003	Heavy Grinding
B100506TCLP	Heavy GrindingLB

# = This Recovery is not flagged as an outlier because the 'Sample Found' amount exceeds by five times or more the 'Spike Added' amount.

\* = RPD or percent recovery is outside the established control limits.

This report may show results for analytes that you have not requested. This is because your sample was chosen to validate a batch of samples. Any quality control exceedances (results with the '-' flag) for these analytes have no impact on your results.

The concentration values on this report may have non-significant digits tabulated. These are the same values used to compute the recovery and/or RPD values listed and are available during data review to verify our calculations.

FORM LTL-RSR-21.0(LTR)

This report is submitted for the exclusive use of the person, partnership or corporation to whom it is addressed. Subsequent use of the name of this company or any of its staff in connection with the advertising or sale of any product or process will be granted only on contract. This company accepts no responsibility except for the due performance of inspection and/or analysis in good faith and according to the rules of trade and science.

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## Testing Laboratories, Inc.

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### Laucks Testing Laboratories Matrix Spike Report

Test: 7470 TCLP Extract (Soil or Water) SDG ID: ACOP061001  
 Lab Sample ID: ACOP061001-003MS Preparation Date: 10/09/2006  
 Client Sample ID: Heavy GrindingMS Run Sequence ID: R011249  
 Analysis Date: 10/10/2006 12:00:00PM  
 Units: mg/L  
 Matrix: Soil

Analyte	Sample Found	Spike Added	MS Found	Recovery	Limit
Mercury	0	0.200	0.1551	78%*	85-115

Associated Samples	
Lab Sample ID	Client Sample ID
ACOP061001-001	Main Floor
ACOP061001-002	Core Area
ACOP061001-003	Heavy Grinding
LB-100506 (TCLP-1)	Heavy GrindingLB

# = This Recovery is not flagged as an outlier because the 'Sample Found' amount exceeds by five times or more the 'Spike Added' amount.

\* = RPD or percent recovery is outside the established control limits.

This report may show results for analytes that you have not requested. This is because your sample was chosen to validate a batch of samples. Any quality control exceedances (results with the '\*' flag) for these analytes have no impact on your results.

The concentration values on this report may have non-significant digits tabulated. These are the same values used to compute the recovery and/or RPD values listed and are available during data review to verify our calculations.

FORM LTL-RSR-21.0(LTR)

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## Testing Laboratories, Inc.

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### Laucks Testing Laboratories

#### Duplicate Report

Test: 7470 TCLP Extract (Soil or Water) SDG ID: ACOP061001  
 Lab Sample ID: ACOP061001-003D Preparation Date: 10/9/2006  
 Client Sample ID: Heavy Grinding Run Sequence ID: R011249  
 Analysis Date: 10/10/2006 12:00  
 Units: mg/L  
 Matrix: Soil

Analyte	Parent Found	Duplicate Found	RPD	Limit
Mercury	0	0	1031%#	20

Associated Samples	
Lab Sample ID	Client Sample ID
ACOP061001-001	Main Floor
ACOP061001-002	Core Area
ACOP061001-003	Heavy Grinding
LB-100506 (TCLP-1)	Heavy GrindingLB

U = The analyte of interest was not detected, to the limit of detection indicated

# = RPD Value is not flagged as an outlier because either the parent found amount or duplicate found amount or both exceed five times the reporting limit

\* = Value exceeded established control limits

The concentration values on this report may have non-significant digits tabulated. These are the same values used to compute the recovery and/or RPD values listed and are available during data review to verify our calculations.

#### FORM LTL-RSR-20.0 (LTR)

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# Laucks <sup>Since 1908</sup>

## Testing Laboratories, Inc.

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### Laucks Testing Laboratories

### Blank Spike Report

Test: 6010B Metals TCLP-7 Extract (Soil or Water)

SDG ID: ACOP061001

Lab Sample ID: S100906ICPW02

Preparation Date: 10/09/2006

Run Sequence ID: R011590

Analysis Date: 10/18/2006 20:39

Matrix: Water

Units: mg/L

Analyte	Spike Added	Found	% Recovery	Limit
Arsenic	2.00	1.811	91%	80-120
Barium	2.00	1.8516	93%	80-120
Cadmium	0.0500	0.0504	101%	80-120
Chromium	0.200	0.195	98%	80-120
Lead	0.500	0.4665	93%	80-120
Selenium	2.00	1.6478	82%	80-120
Silver	0.0500	0.045	90%	80-120

Associated Samples	
Lab Sample ID	Client Sample ID
ACOP061001-001	Main Floor
ACOP061001-002	Core Area
ACOP061001-003	Heavy Grinding
B100506TCLP	Heavy GrindingLB

\* - Recovery exceeded the established control limit

The concentration values on this report may have non-significant digits tabulated. These are the same values used to compute the recovery and/or RPD values listed and are available during data review to verify our calculations.

FORM LTL-RSR-6.0(LTR)

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# Laucks

Testing Laboratories, Inc.

940 South Harney St., Seattle, WA 98108 (206) 767-5060 FAX (206) 767-5063 www.lauckslabs.com

## Laucks Testing Laboratories

### Blank Spike Report

Test: 6010B Metals TCLP-7 Extract (Soil or Water) SDG ID: ACOP061001  
 Lab Sample ID: S100909ICPW02Dup Preparation Date: 10/09/2006  
 Run Sequence ID: R011590  
 Analysis Date: 10/18/2006 20:44  
 Matrix: Water  
 Units: mg/L

Analyte	Spike Added	Found	% Recovery	Limit
Arsenic	2.00	1.8811	94%	80-120
Barium	2.00	1.9325	97%	80-120
Cadmium	0.0500	0.0521	104%	80-120
Chromium	0.200	0.2029	101%	80-120
Lead	0.500	0.4815	96%	80-120
Selenium	2.00	1.708	85%	80-120
Silver	0.0500	0.0465	93%	80-120

Associated Samples	
Lab Sample ID	Client Sample ID
ACOP061001-001	Main Floor
ACOP061001-002	Core Area
ACOP061001-003	Heavy Grinding
B100506TCLP	Heavy GrindingLB

\* = Recovery exceeded the established control limit

The concentration values on this report may have non-significant digits tabulated. These are the same values used to compute the recovery and/or RPD values listed and are available during data review to verify our calculations.

#### FORM LTL-RSR-6.0(LTR)

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# Laucks<sup>Since 1908</sup>

## Testing Laboratories, Inc.

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### Laucks Testing Laboratories

### Blank Spike Report

Test: 7470 TCLP Extract (Soil or Water)

SDG ID: ACOP061001

Lab Sample ID: LCSW

Preparation Date: 10/09/2006

Run Sequence ID: R011249

Analysis Date: 10/10/2006 12:00

Matrix: Water

Units: mg/L

Analyte	Spike Added	Found	% Recovery	Limit
Mercury	0.00400	0.0042	105%	85-115

Associated Samples	
Lab Sample ID	Client Sample ID
ACOP061001-001	Main Floor
ACOP061001-002	Core Area
ACOP061001-003	Heavy Grinding
LB-100506 (TCLP-1)	Heavy GrindingLB

\* = Recovery exceeded the established control limit

The concentration values on this report may have non-significant digits tabulated. These are the same values used to compute the recovery and/or RPD values listed and are available during data review to verify our calculations.

**FORM LTL-RSR-6.0(LTR)**

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# Laucks

Testing Laboratories, Inc.

940 South Harney St., Seattle, WA 98108 (206) 767-5060 FAX (206) 767-5063 www.lauckslabs.com

## Laucks Testing Labs

### Blank Report

Test: 7470 TCLP Extract (Soil or Water)

SDG ID: ACOP061001

Preparation Date: 10/9/2006

Lab Sample ID: B100906HGW01

Run Sequence ID: R011249

Analysis Date: 10/10/2006 12:00

Units: mg/L

Matrix: Water

Analyte	Reported	Flag	Limit
Mercury	0.00500	U	0.00500


Associated Samples	
Lab Sample ID	Client Sample ID
ACOP061001-001	Main Floor
ACOP061001-002	Core Area
ACOP061001-003	Heavy Grinding
LB-100506 (TCLP-1)	Heavy GrindingLB

U = The analyte of interest was not detected, to the limit of detection indicated

\* Measured blank concentration exceeded the established control limit

FORM LTL-RSR-9.0(LTR)

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# Laucks <sup>Since</sup> 1908

## Testing Laboratories, Inc.

940 South Harney St., Seattle, WA 98108 (206) 767-5060 FAX (206) 767-5063 www.lauckslabs.com

### Laucks Testing Labs

### Blank Report

Test: 6010B Metals TCLP-7 Extract (Soil or Water)

Lab Sample ID: B100906ICPW02

SDG ID: ACOP061001  
 Preparation Date: 10/9/2006  
 Run Sequence ID: R011590  
 Analysis Date: 10/18/2006 20:34  
 Units: mg/L  
 Matrix: Water

Analyte	Reported	Flag	Limit
Arsenic	0.200	U	0.200
Barium	0.100	U	0.100
Cadmium	0.100	U	0.100
Chromium	0.100	U	0.100
Lead	0.100	U	0.100
Selenium	0.200	U	0.200
Silver	0.100	U	0.100

Associated Samples	
Lab Sample ID	Client Sample ID
ACOP061001-001	Main Floor
ACOP061001-002	Core Area
ACOP061001-003	Heavy Grinding
B100506TCLP	Heavy GrindingLB

U - The analyte of interest was not detected, to the limit of detection indicated

\* Measured blank concentration exceeded the established control limit

FORM LTL-RSR-9.0(LTR)

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## Transmit report

P.1

10/31/2005 12:17  
27LE06483  
TC:85637

REMOTE STATION	START	TIME	Pages	RESULT	REMARKS
12063824309	10-31 12:17	00:00 43	004/004	OK	

REMARKS TMR:Timer, POL:Poll, TRN:Turn around, ZIN:2in1 Tx, ORG:Original size set, DPG:Book Tx  
FME:Frame erase Tx, MIX:Mixed original, CALL:Manual-Com, KRDS:KRDS, FWD:FORWARD  
FLP:Flip Side 2, SP:Special Original  
FCODE:Fcode, MBX:Confidential, BUL:Bulletin, RLY:Relay, RTX:Re-Tx, PC:PC-FAX  
S-OK:Stop communication, Busy:Busy, Cont.:Continue, No ans:No answer  
M-full:Memory full, PW-OFF:Power switch OFF, TEL:Rx from TEL



14344 SE Industrial Way, Bldg C, Clackamas, Oregon 97015 • Phone 503.785.0404 • Fax 503.786.7877

**FAX TRANSMITTAL FRONT PAGE**

**Date:** 10/31/06

**Send To:** Jim Brown  
Alaskan Copper Works

**Fax:** 206-382-4309

**From:** Matthew Dunn  
ROMIC Environmental Technologies, Corp.

**Subject:** October Service Activities and Related Charges

**Comments:** Please review and comment should you have questions.

AKC-0026171



14344 SE Industrial Way, Bldg C, Clackamas, Oregon 97015 • Phone 503.785.0404, Fax 503.786.7877

October 23, 2006

**Mr. Jim Brown**  
**Alaska Copper Works**  
P.O. Box 3546  
Seattle, Washington 98124-3546  
3223 Sixth Avenue South 98134-2105

**RE: Environmental Reporting Services**

Mr. Brown,

As requested, I have attached a simplified service category chart ROMIC provides on a monthly flat rate. Please also note additional services based on hourly rates.

**Washington and Oregon Compliance Reporting and Site Visitations**

*Dangerous and Hazardous Waste Reports*

These reports are due annually by March 1 of the following year. ROMIC files these to respective state agencies electronically

*SARA Title III Reports*

There are two separate reports due annually. Additionally any new of change in chemical inventories require on-time reporting

1. TIER II
2. TRI (FORM R)

*Stormwater DMR Submittals*

ROMIC takes the testing information obtained from the lab and submits this to the State using a DMR. Romic also tracks benchmark performance.

*Pollution Prevention Plan Yearly Submittals*

After a five year plan has been developed, ROMIC will update and submit the plan performance to the DOE yearly.

*Fire Marshal Report (HSIS)*

This reports reportable chemical inventories to the state fire marshal annaully

*Quarterly Site Visits*

ROMIC comes out to your site to inspect waste container management, recordkeeping and chemical inventory status as well as collect data necessary for reporting purposes

**You are charged a monthly fee of 408.32 for the above services.**

Any additional services such as new or revised plan reviews, permit submittals or modifications, waste reduction work, regulatory interface, or compliance mediation issues, training, or specific requests are all performed on an hourly basis as stated on the attached service fee and rate schedule.

## ROMIC Hazardous Waste and Material Management Service Fees and Rates

Service	Description	Frequency	Rate
Washington and Oregon Compliance Reporting	<i>Dangerous and Hazardous Waste Reports</i>	Annual	
	<i>SARA Title III Reports</i>		
	<i>Tier II</i>	Annual	
	<i>Form R</i>	Annual	
	<i>Change in Inventory</i>	As Needed	
	<i>Stormwater DMR Submittal</i>	Quarterly	
Washington and Oregon Site Auditing	<i>Pollution Prevention Plan Yearly Submittals (PPP)</i>	Annual	
	<i>Fire Marshal Report (HSIS)</i>	Annual	
	<i>Site Visits</i>	Quarterly	
<b>TOTAL MONTHLY RATE FOR ABOVE SERVICES</b>			<b>408.32</b>
Plan Revision Services	SPCC plan modification Pollution Prevention Plan Renewal	As Needed 5 years	
Regulatory and Technical Assistance	Regulatory interface, rule interpretation, representation	As Needed	95.00/hr
On Site Compliance and Safety Training	<ul style="list-style-type: none"> <li>• OSHA 40 Hour Waste Operations and Emergency Response</li> <li>• OSHA 8 Hour Annual Refresher</li> <li>• OSHA 24 Hour Emergency Response</li> <li>• OSHA Hazard Communication</li> <li>• EPA Facility Employee</li> <li>• Specialty and State Specific Health and Safety and Environmental Compliance</li> </ul>		75.00/hr
			75.00/hr
			75.00/hr
			75.00/hr
			750.00/lump
			Quoted
Site Work (technician)	Sampling, waste handling, all misc. site labor	As Needed	47.50/hr
Independent Lab Work	Waste stream testing	As Needed	Cost + 10%

Washington sales tax may apply to certain tasks.

Matthew Dunn



14344 SE Industrial Way, Bldg C, Clackamas, Oregon 97015 • Phone 503.785.0404, Fax 503.786.7877

October 17, 2006

**Mr. Jim Brown**  
**Alaska Copper Works**  
P.O. Box 3546  
Seattle, Washington 98124-3546  
3223 Sixth Avenue South 98134-2105

**RE: Environmental Reporting Services Update**

Slug Discharge Plan Submittal

Slug Discharge Control Plans for your 6<sup>th</sup> Avenue and East Marginal Way facilities have been submitted to King County. (See confirmation comment from King County below)

ROMIC has enclosed a service invoice for the above services at the established hourly rate for regulatory and technical services. Please provide a PO for the amount indicated on the attached invoice. ROMIC will mail you copies of the plans for your files once a PO has been issued. We will then forward an invoice to your accounting department.

Stormwater Management Program

In regards to our discussion last week, ROMIC will submit stormwater quarterly DMR's (Discharge Monitoring Reports) on you behalf commencing October 1, 2006. It is ROMIC's goal to assist managing the reporting aspects of your stormwater management program so that we can ultimately reduce the quantity of sampling points.

Reduction will occur automatically should any 8 consecutive DMR's for any one sampling point meets the minimum benchmarks for required testing parameters.

Alaskan Copper will still conduct all sampling and submittal for testing. ROMIC will obtain testing results and submit DMR's in accordance with the equipments of your existing plan.

Relationship building with DOE regarding specifics of your plan is essential to achieving reducing the quantity of sampling points and associated costs. To this extent, ROMIC will endeavor to work for the best interest of Alaskan Copper Works.

Pollution Prevention Planning

As discussed, ROMIC will be meeting with DOE on Thursday October 19<sup>th</sup>, 2006. The purpose of the meeting is to discuss toxics reduction for the 6<sup>th</sup> Avenue facility. It is ROMIC's contention that your waste chrome generation can be significantly reduced during 2007. I have discussed the particulars of our reduction plan with Jerry Thompson. Our plan will require input from DOE before we can proceed with the mechanical aspects of reduction.

The specifics of reduction involve the addition of a complexing chemical agent to the cutting table slag before it is vacuumed out by your environmental vendor. With chemical addition ROMIC believes that the slag can be removed from the table tray as a non RCRA waste.

After discussing this with Jerry, I have concluded that this process can be conducted safely with no impact to production and reduce if not completely eliminate the hazardous waste characteristics of the chrome slag.

#### *Pilot Test Synopsis*

1. We will begin a pilot test by collecting a number of samples during the next up coming table clean out. A select group of samples will be treated before slag is removed and treated.
2. These will be compared with slag collected in drums filled after the clean out. A comparison will determine if the treatment process is successful.
3. We can then run a full scale treatment on the slag after all the table water has been removed and before vacuuming. We will then sample the containerized waste for TCLP.
4. If successful you may look forward to a significant reduction in hazardous waste generation. This would also put Alaskan Copper in the forefront of the Washington Pollution Prevention Program.

ROMIC will provide sampling and testing at the hourly rates indicated in our established rate schedule. ROMIC will bill Alaskan Copper for only the TCLP testing costs for the pilot study but not bill for any pilot sampling and testing labor time you should the reduction plan fail. If it does work ROMIC will bill for all labor costs associated with the reduction plan development. ROMIC will also charge a premium for the development of a regulatory compliance and permanent method for removing TCLP characteristics from the chrome slag.

I will present you with estimated costs for development and implementation of the chrome reduction plan after I have met with the DOE.

Irrespective of the chrome reduction plan, ROMIC will facilitate completion and submittal of the 2005 PPP to the DOE by the end of this month. I will need some data from you later on and will contact you at the appropriate time.

#### Industrial Waste Discharge Modification

I will be discussing the modification to the discharge permit to include the ink waste as discussed last week. I do not believe that King County will have issues with this modification. I will charge for my time for the modification submittals not to exceed 4 hours at the established hourly rate for technical services.

#### Review of existing SPCC and Health and Safety Plans

As discussed, I would like to stop by next month to obtain copies of your existing SPCC and health and safety plans to evaluate compliance with current regulatory standards. The review is at no charge and I will send you a report indicating what (if any) changes are warranted along with a cost for updating.



4500 15<sup>th</sup> St. E., Unit A • Tacoma, WA 98424 • Phone 253.926.0580, Fax 253.926.0599

October 10, 2006

**Mr. Jim Brown**  
**Alaska Copper Works**  
P.O. Box 3546  
Seattle, Washington 98124-3546  
3223 Sixth Avenue South 98134-2105

**RE: Reporting Services Update**

Dear Mr. Brown

This update provides you with a brief synopsis of environmental reporting and compliance services ROMIC is currently providing your company in Washington and Oregon.

**Washington Services**

Initial annual reporting (all Washington locations)

1. Dangerous Waste Annual Report due by March 1
2. Tier II hazardous material inventory report due March 31 (Washington)
3. Form R (TRI) report for toxics released due by July 1

It is my understanding that you have a general schedule of annual reporting due dates provided by Sydney Leff. Please contact me should you need additional copies of this reporting schedule.

Added reporting and/or compliance work requested by Alaska Copper

*Slug/discharge Plan*

This will be submitted to King County for the 6<sup>th</sup> Ave and Marginal Way locations by October 15, 2006

**NOTE:** I have left a message with Gerald Thompson to provide certain information to complete the plan. An invoice will be forwarded to you for review before we bill for services.

*Pollution Prevention Plan*

ROMIC has contacted and is working with DOE to produce 2005 update to plan by November 1, 2006

**NOTE:** I will be sending you a general questionnaire regarding portions of the plan shortly that only you would know about. DOE will NOT penalize you for any delays regarding this submittal. An invoice will be forwarded to you for review before we bill for services.



## **Oregon Services**

### Initial annual reporting (Portland Branch)

Hazardous Waste Activity Annual Report due by March 1  
Tier II hazardous material inventory report due March 31 (did not qualify for reporting)  
Form R (TRI) report for toxics released due by July 1 (did not qualify for reporting)

### Added reporting and/or compliance services requested by Alaska Copper

#### *DEQ compliance inspection response services*

ROMIC was contacted by the Portland Branch Manager (Richard Taylor) to assist in responding to a DEQ site inspection occurring on August 10, 2006. DEQ issued the company a list of hazardous waste management violations noted during the inspection. These particular issues were not associated with reporting services provided by ROMIC however, we contacted DEQ on behalf of Alaska Copper and Brass and arranged to have compliance issues addressed without penalty. ROMIC is currently engaged with the Portland Branch as facilitator for the following corrective actions

1. Develop and submit an SQG SPCC plan to local agencies
2. Provide an alternative to existing aerosol dispensing station
3. Provide and post emergency notification and contact names at hazardous waste generator and storage locations
4. Develop and implement a toxic reduction plan
5. Provide hazardous waste management training to management staff

ROMIC expects satisfactory compliance resolution by October 20<sup>th</sup>, 2006. The above compliance services, with the exception, of training have been provided at no cost.

Please feel free to contact me should you have any questions regarding any of the services indicated above.

Sincerely,

Matthew Dunn  
(b) (6)



**ROMIC**  
ENVIRONMENTAL  
TECHNOLOGIES CORP.

---

4500 15<sup>th</sup> St. E., Unit A • Tacoma, WA 98424 • Phone 253.926.0580, Fax 253.926.0599

February 21, 2006

**Mr. Jim Brown**  
**Alaska Copper Works**  
P.O. Box 3546  
Seattle, Washington 98124-3546  
3223 Sixth Avenue South 98134-2105

**RE: Reporting Update and Request for Authorization**

Dear Mr. Brown

Please find the attached EPCRA Reporting Elements Summary Table. With the exception of Washington State Dangerous Waste Annual Reporting this matrix gives you a summary of when each of the required reports under SARA Title III are required and what should be contained in each report.

ROMIC generates	Dangerous Waste Annual Report due by March 1
	Tier II hazardous material inventory report due March 31 (Washington)
	Form R (TRI) report for toxics released due by July 1

Generally each report is started 30 days in advance and submitted direct to the appropriate agency(s) with a copy of the report prior to submittal sent to you for final review.

ROMIC has in place all the necessary access protocols to develop, generate, and in most instances submit reports online.

During the course of services and as we enter into stormwater management assistance, we are requesting authorization as your agent to obtain state or federal generated documents and/or access codes pertaining to reporting information.

This authorization allows ROMIC to discuss with state and federal environmental personnel pertinent information that will provide for better service.

This authorization is limited to discussing or obtaining information for purposes of developing timely and accurate reporting. This authorization will expire on July 31, 2007.

Your return signature is appreciated.

---

Mr. Jim Brown  
Alaskan Copper Works

---

Date

Sincerely,

Matthew Dunn

AKC-0026178



August 15, 2005

**Mr. Jim Brown**

**Alaskan Copper Works**

P.O. Box 3546

Seattle, Washington 98124-3546

3223 Sixth Avenue South 98134-2105

**RE: Environmental Compliance Management Services**

Mr. Brown,

On July 29, 2005 ROMIC conducted an environmental compliance management program assessment at your Seattle facility. This assessment was to evaluate how your programs are currently managed and to determine your specific needs regarding future hazardous waste and environmental management reporting requirements.

ROMIC met with Mr. Gerald Thompson who maintains the daily hazardous waste and environmental management programs. Mr. Thompson's assistance and knowledge was invaluable in our ability to accurately assess your needs.

During our assessment we inspected and reviewed the following records

1. Hazardous waste shipping papers and supporting documentation for 2005
2. Stormwater discharge permit and sampling records for 2005
3. Pre-treatment system bi-weekly discharge reports

In addition, we discussed the following issues

1. The types and amount of hazardous waste generated, the processes generating wastes, and specifically how these wastes are handled prior to off site shipment and disposal.
2. Stormwater discharge sampling locations and historical background
3. Nitric acid neutralization system operational control

Finally ROMIC was given a tour of the Alaska Copper complex and specific manufacturing and support processes located in buildings 628, 3200, 3223, 3301 and 3405.

In summary ROMIC considers the overall management of hazardous and industrial waste to be adequate in terms of standing up to general Department of Ecology site inspection. Current recordkeeping meets minimum requirements for maintaining accurate waste shipment and disposal records. No review of past Toxic Release Reporting (TRI) documentation was conducted during ROMIC's assessment.

**Romic has also determined that a number of cost saving opportunities exist that may significantly reduce hazardous waste generation and related on site waste management costs.**

After review and visitation of your present programs and facility, ROMIC is prepared to offer the following services.

### **Hazardous Waste Shipping**

Provide quarterly updating and production of the Washington State Dangerous Waste Annual Report. Specifically, ROMIC will record required waste reporting information from hazardous waste manifests during any three month period. Recording will be conducted on location so there will be no needs for submitting copies. During recording, ROMIC will review each manifest, LDR, supporting waste classification documentation and other supporting documentation to insure compliance throughout the quarter. By no later than January 15 of the following year, you will receive a completed report for signature and submittal to DOE.

ROMIC will address any deficiencies noted during review and recording of waste shipping documents to include correspondence with the TSDF, submitted of corrected documents or notifications, and correction signatures.

### **Storm Water Discharge Monitoring Reporting**

Provide written stormwater monitoring reports from each sampling point outfall by the reporting date of the reporting period (Quarter). Report contents for each quarter will be subject to conditions of the permit. ROMIC believes that only a few of the existing outfalls need be sampled and will discuss current reporting requirements and understanding between DOE and Alaska Copper with you before implementing this service.

### **TRI Section 313 Reporting**

Provide quarterly updates and production of annual TRI reports. Reporting will be based on use of nitric acid and any other chemical over the reporting threshold as listed in the EPCRA Section 313 Toxic chemical inventory.

### **On Site Hazardous Waste Auditing**

ROMIC will conduct a semi-annual facility wide hazardous waste and material management audit. The purpose of this audit is to assess on-site management of hazardous waste and materials. Auditing results will be made part of the current SPCC. Audit parameters will include;

- Hazardous waste storage locations, security and postings
- Waste container integrity and shipping condition
- Container labeling, marking and waste accumulation dates
- Hazardous waste and material handling in proximity to sensitive on site environmental receptors
- Review of emergency contacts and phone numbers listed in the written SPCC and Contingency plan
- Recommendations relating to both environmental management and health and safety

### **Reporting Format and Service Fees**

ROMIC will provide a written report update in tabular form within 15 working days after each on-site visitation. Reports will be presented on a computerized printout indicated activities occurring during the previous quarter. Year end reports are prepared on proper regulatory reporting forms requiring only your signature.

As requested, ROMIC will bill a monthly flat fee in the amount of **\$316.66** payable net 30 days after receipt. A complete list of service fees and rates is provided on the following page.

## Hazardous Waste and Material Management Service Rates

Service	Description	Frequency	Rate
Washington Site Visitation Compliance Reporting	All state and federal hazardous waste generator and hazardous material report generation and submittal	Monthly	316.66
Oregon Site Visitation Compliance Reporting	All state and federal hazardous waste generator and hazardous material report generation and submittal	Monthly	91.66
Regulatory and Technical Assistance	Regulatory interface, rule interpretation, representation	As Needed	95.00/hr
On Site Compliance and Safety Training	<ul style="list-style-type: none"> <li>• OSHA 40 Hour Waste Operations and Emergency Response</li> <li>• OSHA 8 Hour Annual Refresher</li> <li>• OSHA 24 Hour Emergency Response</li> <li>• OSHA 8 Hour Awareness</li> <li>• OSHA Hazard Communication</li> <li>• EPA Facility Employee</li> <li>• Specialty and State Specific Health and Safety and Environmental Compliance</li> </ul>	As Needed	75.00/hr
Site Work (technician)	Sampling, waste handling, all misc. site labor	As Needed	47.50/hr
Independent Lab Work	Waste stream testing	As Needed	Cost + 10%

Washington sales tax may apply to certain tasks.

### Service Assurance and Guarantee

1. All RomiC filed technicians are 40 hour trained or have specific training and qualifications commensurate to assigned tasks.
2. ROMIC warrants the timely and accurate completion of work including auditing, reporting, site work and associated health and safety procedures to be current and consistent with applicable state DOE, federal OSHA and EPA regulations as well as acceptable ASTM methodologies.
3. Although ROMIC does not provide legal council or representation, ROMIC will provide to you or regulatory agency explanation and all supporting documentation and procedures used for any work or action based on ROMIC's interpretation of state and federal hazardous waste, environmental, or worker health and safety regulation.
4. There will be no charge for any service that ROMIC fails to provide as agreed to in writing or in a manner that falls short of the minimum expectations, goals, or objectives presented in any of ROMIC's written service orders.

Please feel free to contact me should you wish to proceed.

Sincerely,

Sydney Leff  
 WA Full Service Specialist  
 RomiC Environmental Corp.  
 4500 15<sup>th</sup> St. E., Unit A  
 Tacoma, Washington  
 Toll Free 888-242-8592

Contractor License# ROMICET954DN WA UBI# 602319137 OR Contractors License# 155506

Cell: (b) (6)

Secured by law

Contractor License# ROMICET954DN WA UBI# 602319137 OR Contractors License# 155506

AKC-0026182

The specifics of reduction involve the addition of a complexing chemical agent to the cutting table slag before it is vacuumed out by your environmental vendor. With chemical addition ROMIC believes that the slag can be removed from the table tray as a non RCRA waste.

After discussing this with Jerry, I have concluded that this process can be conducted safely with no impact to production and reduce if not completely eliminate the hazardous waste characteristics of the chrome slag.

#### *Pilot Test Synopsis*

1. We will begin a pilot test by collecting a number of samples during the next up coming table clean out. A select group of samples will be treated before slag is removed and treated.
2. These will be compared with slag collected in drums filled after the clean out. A comparison will determine if the treatment process is successful.
3. We can then run a full scale treatment on the slag after all the table water has been removed and before vacuuming. We will then sample the containerized waste for TCLP.
4. If successful you may look forward to a significant reduction in hazardous waste generation. This would also put Alaskan Copper in the forefront of the Washington Pollution Prevention Program.

ROMIC will provide sampling and testing at the hourly rates indicated in our established rate schedule. ROMIC will bill Alaskan Copper for only the TCLP testing costs for the pilot study but not bill for any pilot sampling and testing labor time you should the reduction plan fail. If it does work ROMIC will bill for all labor costs associated with the reduction plan development. ROMIC will also charge a premium for the development of a regulatory compliance and permanent method for removing TCLP characteristics from the chrome slag.

I will present you with estimated costs for development and implementation of the chrome reduction plan after I have met with the DOE.

Irrespective of the chrome reduction plan, ROMIC will facilitate completion and submittal of the 2005 PPP to the DOE by the end of this month. I will need some data from you later on and will contact you at the appropriate time.

#### Industrial Waste Discharge Modification

I will be discussing the modification to the discharge permit to include the ink waste as discussed last week. I do not believe that King County will have issues with this modification. I will charge for my time for the modification submittals not to exceed 4 hours at the established hourly rate for technical services.

#### Review of existing SPCC and Health and Safety Plans

As discussed, I would like to stop by next month to obtain copies of your existing SPCC and health and safety plans to evaluate compliance with current regulatory standards. The review is at no charge and I will send you a report indicating what (if any) changes are warranted along with a cost for updating.

Upcoming Waste Generation Reporting

We will be stopping by in mid December to review your hazardous waste activities for the year 2006 in preparation for the 2006 annual report due March 1, 2007. This will be for both Washington and Oregon facilities. I will contact Jerry in Seattle and Jim in Portland at that time.

Please feel free to contact me should you have any questions. It is our pleasure to be of assistance.

Sincerely,

Matthew Dunn

e-mail memo From King County

Hi Matthew,

Sorry I wasn't in the office when you called yesterday. Thank you for the email attachments. The two Spill/Slug Discharge Control Plans for the Alaskan Copper sites look good! Thank you.

Lydia Eng  
Compliance Investigator  
King Co. Industrial Waste Program  
ph: 206-263-3017/fax: 206-263-3001  
<http://dnr.metrokc.gov/wlr/indwaste>

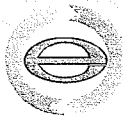
Invoice amount for slug plan development and submittal

**Customer:** Alaska Copper Works  
**Project #:** 4890  
**PO#:** Pending  
**Comments:** PSD Permit Application

**Customer** AC (S)  
**Status:** Complete  
**Sales:** House  
**Project Start:** 10/1/2006

Date	Labor/Description	Meas.	Ext	Rate	Charge
10/16/2006	Final write up and submittal	Hr	3	\$95.00	\$285.00
10/12/2006	Meeting w County and IDP review	Hr	2	\$95.00	\$190.00
10/12/2006	Travel	Hr	2	\$95.00	\$190.00
10/2/2006	Plan Development	Hr	6	\$95.00	\$570.00
				<b>Price</b>	<b>\$1,235.00</b>





**ROMIC**

ENVIRONMENTAL  
TECHNOLOGIES CORP.

June 14, 2005

**Mr. Jim Brown**

**Alaskan Copper Works**

P.O. Box 3546

Seattle, Washington 98124-3546

3223 Sixth Avenue South 98134-2105

**Alaskan Copper and Brass Company**

P.O. Box 5067

Portland, Oregon, 97208-5067

2440 Southeast Raymond (97202-4638)

**RE: Waste Management Services**

Romic Environmental Technologies, Corp (ROMIC) has prepared this proposal to help you manage your hazardous waste program. As a large quantity generator in the state of Washington you can appreciate the intricacies, time, and energy involved in keeping up and complying with state and federal environmental and worker safety regulations. For this reason, we believe we can provide the type of service that allows you to conduct your business without the hassle, worry, or doubt about important compliance issues.

Before presenting the details of our proposal, first allow us to briefly describe who we are and what we do.

ROMIC is a full service environmental management company servicing major industry, commercial businesses and government. ROMIC's services range from hazardous waste characterization, transportation and disposal to a wide variety of hazardous materials process treatment, systems decontamination, and regulatory compliance contracting. ROMIC's customer base includes many of the top Fortune 500 companies to include the three largest computer and semiconductor manufacturing firms.

ROMIC operates EPA permitted hazardous waste disposal facilities in California and Arizona with waste handling transfer facilities situated in Oregon and Washington.

ROMIC employs over 200 highly trained and experienced hazardous waste technicians, project managers, chemists, regulatory professionals, health and safety specialists, and technical service staff located throughout the United States.

ROMIC began in 1964 by providing safe and complaint hazardous waste management services to the local community in Palo Alto, California. Since then ROMIC has grown and matured to become a highly professional and experienced international industry leader servicing clients in over 24 states, Canada, Mexico, Puerto Rico, and Costa Rica. Over the years, ROMIC has developed a reputation for dependability and service emphasizing safety, compliance, and cost effectiveness.



## What We Can Do For You

Put simply, ROMIC can perform all facets of day-to-day environmental compliance related tasks regarding the waste you generate. This covers proper waste classification, container labeling, marking, and proper storage to recordkeeping, and annual waste activity and permit reporting. ROMIC's expertise extends to POTW and stormwater discharge permit maintenance, waste reduction, and employee EPA facility and OHSA worker safety training.

## Why Romic?

1. Waste management is all we do. ROMIC offers waste management services, not products, so our value can only be demonstrated by our actions and results. As such, we provide you with dedicated people and resources committed to you and your operation that assures you the attention and service you expect.
2. As an operator of federally permitted waste disposal facilities we have to know a lot about the environmental regulations governing hazardous waste generators, transporters and TSDRF's. Many of our key managing staff are former business owners and we understand the important issues and concerns as hazardous waste generators. ROMIC draws upon the collected wealth of technical knowledge and handling experience from over 200 highly trained professionals serving customers in over 24 states.
3. To foster long relationships we take personal interest in your business by getting involved in your operation. We share information to you and your employees to better manage and improve the quality and cost effectiveness of your waste management and safety programs. We keep you updated and informed on changes in hazardous waste and environmental regulations that can affect your business.
4. Finally, helping to manage waste sometimes means "getting your hands dirty". ROMIC has the staff, field personnel, and expertise to make things happen by suggesting and, if requested, actually doing the hands on work to improve chemical processing, neutralization or pre-treatment systems, and water discharge quality.

## Services We Can Provide

Although ROMIC provides compliance services for all 50 states, for purposes of this proposal, ROMIC is addressing Washington state dangerous waste management services broken down into the following four categories.

### 1. On Site Management Services

On site management involves regular auditing of your operations as it pertains to proper handling of generated waste, methods to reduce waste generation, insuring that your employees are adequately trained in the proper ways to containerize and store dangerous waste, and what to do in the event of a dangerous waste spill or release. In your case you may also wish us to conduct storm water sampling and NPDES permit sampling. We can talk more about specific issues during a future site walk.



## 2. Recordkeeping and Tracking

Recordkeeping involves an organized and accurate means for keeping tabs on what and where waste is being generated, how much, and where it all goes. This also includes proper manifesting of waste shipments, use of land ban restriction notifications, and appropriate documentation that supports waste stream classification. (WAC 173-303-210) requires the generator to keep on premises copies of annual reports, Notification of Dangerous Waste Activities, manifests, exception reports, test results, and waste analyses, etc., for a minimum of five years.

## 3. Annual Reporting

The state of Washington manages RCRA and other federal environmental regulatory programs in addition to various state level programs. Generators summarize their activities through annual reporting. These include:

### *The Washington Department of Ecology (DOE) Dangerous Waste Annual Report*

This is a yearly report of dangerous waste generation and management activities. Handlers of dangerous waste – e.g., generators, transporters, transfer facilities, and management facilities – are required to report their activities to DOE every year by March 1.

### *Site Identification (Site ID) Form*

Your Site ID contains the most recent location and contact information for your facility from Ecology's annual report or Notification files. You can also update waste management information, or withdraw your RCRA Site ID numbers with the form.

### *Off-Site Identification Information (OI) Form*

This form collects the name, address, and RCRA Site ID Number of all dangerous waste handlers with whom you interacted in sending waste off-site or in receiving waste from off-site.

### *Generation and Management (GM) Form*

This form collects information about generated waste streams, where the waste stream was managed (on-site or off-site) from generators, and how it was managed.

### *Waste Received (WR) Form*

This form collects information about management of waste streams received by TSDR facilities.

### *Toxic Chemical Release Reporting — Section 313*

This report is required from facilities that manufactures (including imported) or processes or otherwise uses a Toxic Chemical in excess of the threshold quantity during any calendar year. Threshold quantities that trigger reporting are 25,000 pounds manufactured or processed or 10,000 pounds otherwise used, except for certain Persistent Bioaccumulative Toxic Chemicals (PBT). Beginning with the 2000 reporting year, the threshold for the PBT chemicals is lowered to 100 or less depending on the chemical.

### *Discharge Monitoring Report (DMR)*

If you are currently operating under an industrial stormwater general permit, you are required to do sampling in the second quarter of this year (April/May/June). DMR reports are generally due by August 14.



#### 4. Health and Safety

ROMIC provides a variety of health and safety as well as environmental compliance training services. Our services meet and exceed OSHA and EPA minimum training criteria for employees and workers who face the potential for exposure to hazardous substances, materials, or waste in the work place.

Our services also include training for employees who are responsible or involved in responding to chemical release emergencies.

OSHA requires all employees to have hazardous communication training which is designed to inform employees of chemical related hazards in the work place as well as having access and knowing how to use important information about chemicals used or handled at work.

Employees who are expected to respond to chemical emergencies such as a release or spill must be training commensurate to their assigned roles and at a minimum must know how to properly identify a chemical emergency and follow prescribed methods for notifying the employer or appropriate response services. In addition, EPA requires certain employees to be familiar with emergency chemical supply or process systems in the event of an emergency or evacuation. Specific health and safety training includes;

- OSHA 40 Hour Waste Operations and Emergency Response Training
- OSHA 8 Hour Annual Refresher Training
- OSHA 24 Hour Emergency Response Training
- OSHA 8 Hour Awareness Training
- OSHA Hazard Communication Training
- EPA Facility Employee Training (8 Hours)
- Specialty and State Specific Health and Safety and Environmental Compliance Training

#### Service Rates

A free, no-obligation site visit is requested so that a detailed scope of work can be developed that will provide you with estimated total costs. Rates indicated below are general rates invoiced monthly with approved customer work order. A flat fee for one or more services may be negotiated should you wish to enter into a yearly service agreement. Washington sales tax may apply to certain tasks.

Service	Description	Frequency	Rate
Site Visitation	Recordkeeping and documentation review	Quarterly	95.00/hr
Regulatory and Technical Assistance	Regulatory interface, rule interpretation, representation	As Needed	95.00/hr
Compliance Reporting	All state and federal hazardous waste generator and hazardous material report generation and submittal	Annually	75.00/hr
Site Work (technician)	Sampling, waste handling, all misc. site labor	As Needed	47.50/hr
Independent Lab Work	Waste stream testing	As Needed	Cost + 10%



### **Service Assurance and Guarantee**

1. All Romic filed technicians are 40 hour trained or have specific training and qualifications commensurate to assigned tasks.
2. ROMIC warrants the timely and accurate completion of work including auditing, reporting, site work and associated health and safety procedures to be current and consistent with applicable state DOE, federal OSHA and EPA regulations as well as acceptable ASTM methodologies.
3. Although ROMIC does not provide legal council or representation, ROMIC will provide to you or regulatory agency explanation and all supporting documentation and procedures used for any work or action based on ROMIC's interpretation of state and federal hazardous waste, environmental, or worker health and safety regulation.
4. There will be no charge for any service that ROMIC fails to provide as agreed to in writing or in a manner that falls short of the minimum expectations, goals, or objectives presented in any of ROMIC's written service orders.

We hope this proposal is what you're looking for and would be delighted to meet you at your convenience to discuss a detailed scope of work and to answer any questions you may have regarding our services. Please feel free to contact me should you wish to proceed.

Sincerely,

Sydney Leff  
WA Full Service Specialist  
Romic Environmental Corp.  
4500 15<sup>th</sup> St. E., Unit A  
Tacoma, Washington  
Toll Free 888-242-8592  
Cell: (b) (6)  
[Sydneyl@romic.com](mailto:Sydneyl@romic.com)

### **Licenses**

Romic Facility EPA# CAD009452657  
WA Contractor License# ROMICET954DN  
WA UBI# 602319137  
OR Contractors License# 155506  
AZ Contractors License# ROC124850

